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VIA ECF

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December 14, 2022

Honorable Dennis Montali
United States Bankruptcy Court
Northern District of California
450 Golden Gate Avenue, 16th Floor
San Francisco, CA 94102

Re: *In re PG&E Corporation and Pacific Gas and Electric Company, Case No. 19-30088 (DM) (Jointly Administered)*

Dear Judge Montali:

We represent the Reorganized Debtors and write concerning the proposed order in connection with the motion by the Reorganized Debtors to further extend the objection deadline for claims [Docket No. 13122] (the “**Motion**”). At the conclusion of the November 30, 2022 hearing, the Court granted the Motion in part and denied the Motion in part and instructed the Reorganized Debtors to submit an order after consulting with counsel for certain objectors whose objections remained unresolved (the “**Objectors**”). A copy of the order proposed by the Reorganized Debtors is attached as Exhibit A hereto (the “**Reorganized Debtors’ Proposed Order**”) and is being submitted via ECF for approval concurrently with the filing of this letter. The Reorganized Debtors have worked with the Objectors and have largely agreed to the language of the Reorganized Debtors’ Proposed Order, but there is one issue on which the parties have been unable to agree.

While the Reorganized Debtors and the Objectors agree on all of the actual language of the Reorganized Debtors’ Proposed Order, the Objectors want to add a sentence to Paragraph 6 (set forth below). Paragraph 6 of the Reorganized Debtors’ Proposed Order is a reservation of rights paragraph, requested by the Objectors, that states that the Reorganized Debtors’ Proposed Order does not itself preclude the Objectors from making a separate motion to modify the Securities Claims Procedures nor does it preclude the Reorganized Debtors from opposing any such motion on any ground. While the Reorganized Debtors believe that Paragraph 6 is both unnecessary and goes beyond the scope of the Motion, the Reorganized Debtors were willing to include such a reservation, as a matter of compromise, as long as that paragraph was neutral. The Objectors, however, seek to add an additional first sentence to Paragraph 6 that states: “Any objections relating to the Securities Claims Procedures or any securities class action process or potential securities class action settlement are preserved.” The Motion did not seek to establish, or modify, the Securities Claims Procedures, nor did it seek the Court’s approval of a securities class action process or potential securities class action settlement, and the objections were to

the extension of the claims objection deadline, not the Securities Claims Procedures. Moreover, any objections to the Securities Claims Procedures should have been made at the time that those procedures were adopted and became the subject of an order. In any event, all of those issues are outside the scope of the current Motion and the Court need not and should not address them at this time or in this order. As such, the proposed sentence is inaccurate, unnecessary and unwarranted. The Reorganized Debtors therefore request that the Reorganized Debtors' Proposed Order be entered as is – with a reservation of rights as already contained therein and without the additional sentence demanded by the Objectors.

Given that the current deadline for the Reorganized Debtors to object to Claims under Section 7.1 of the Plan is Monday, December 19, 2022, the Reorganized Debtors respectfully request the Court enter the Reorganized Debtors' Proposed Order, as submitted, prior to that date.

Respectfully submitted,

/s/ Richard W. Slack
Richard W. Slack

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